

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

MABIOR JOK,	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:19–CV–70
	)	
CITY OF BURLINGTON, VERMONT	)	
	)	
BRANDON DEL POZO,	)	
INDIVIDUALLY AND IN HIS	)	
OFFICIAL CAPACITY AS CHIEF	)	
OF POLICE FOR THE CITY OF	)	
BURLINGTON, VERMONT	)	
	)	
JOSEPH CORROW,	)	
INDIVIDUALLY AND IN HIS	)	
OFFICIAL CAPACITY AS A POLICE	)	
OFFICER FOR THE CITY OF	)	
BURLINGTON, VERMONT,	)	
	)	
Defendants.	)	

**DEFENDANTS’ PROPOSED EXHIBIT LIST FOR 08/26/2024 TRIAL**

Exhibit	Description	Offered	Admitted
A.	Officer Corrow Body Camera Video		
B.	Jacob Garrett Video		
C.	Incident Report		
D.	Burlington Use of Force Policy		
E.	Bellavance Emails re: Use of Force PowerPoint, 02/25/2013		
F.	Use of Force PowerPoint		
G.	VT Partnership for Fairness and Diversity Training Emails, 07/09/2014		
H.	Jean Markey-Duncan complaint, 11/02/2015		
I.	Dylan Zeitlyn complaint and email correspondence, 11/02/2015		
J.	Email correspondence re: 30 Guiding Principles of Taking UOF Policies to a Higher Level, 02/15/2016		

K.	del Pozo email re: 30 Guiding Principles of Taking UOF Policies to a Higher Level, 02/15/2016		
L.	Connor Brooks email to del Pozo re: Traffic Searches of Black Drivers, 03/30/2016		
M.	NAAG invite to del Pozo, 06/09/2016		
N.	BPD Use of Force and Response to Resistance Analysis, 01/25/2017		
O.	Force Science Institute email, 04/07/2016		
P.	Nick Ruderman complaint, 05/15/2016		
Q.	Email to BPD employees re: "New data points out possible racial bias with Vermont State Police", 05/25/2016		
R.	Mike Feiner email exchange with del Pozo, 07/10/2016		
S.	del Pozo social media post re: dual patrols, 07/17/2016		
T.	Use of Force email from Eric Fowler and table, 10/25/2016		
U.	VSP email to del Pozo re: training workshop; Biased Based Policing Reports, 01/29/2017		
V.	Dolan Consulting Group, "Please Stop Using Census Data!", 09/2016		
W.	Dolan Consulting Group, "Dispelling the Myths Surrounding Police Use of Lethal Force", 07/2016		
X.	ACLU request by email, 09/18/2017		
Y.	Email correspondence re: complaints to City Hall, 10/04/2017		
Z.	BPD Citizens Complaint Process		
AA.	Hart email to del Pozo re: complaint packets, 12/21/2017		
BB.	Email correspondence re: Gustafson complaint, 09/08/2017		
CC.	BPD Monthly Department Head Report, January 2018		
DD.	del Pozo email re: tracking arraignments, 01/02/2018		
EE.	Email from Joan Shannon to del Pozo re: request to discuss police statistics, 02/01/2018		
FF.	Email to BPD employees re: implicit bias, 02/08/2018		
GG.	VCJTC letter to del Pozo re: UOF training, 09/12/2018		
HH.	Stetson email and report to del Pozo re: arraignment data, 10/09/2018		

II.	ICAT Training Materials		
JJ.	Mary Morrissey email re: Corrow, 02/19/2015		
KK.	Corrow email re: request training, 08/01/2017		
LL.	del Pozo commendation for Corrow, 03/13/2018		
MM.	Corrow Traffic Safety Award, 3/16/2018		
NN.	Possible Data Projects		
OO.	Corrow request re: equipment, 05/14/2018		
PP.	Stetson email to del Pozo re: Jok 23 prior arrests, 05/09/2019		
QQ.	Nadeau email re: Jok arrest and spit on officer, 05/28/2018		
RR.	Shift Reports re: Mabior Jok, 07/24/2018		
SS.	Daily Arrest Reports re: Mabior Jok, 07/24/2018, 07/31/2018 and 08/01/2018		
TT.	Daily Arrest Report re: Mabior Jok, 07/25/2018 and 07/24/2018		
UU.	Daily Arraignment Report re: Mabior Jok, 08/17/2018		
VV.	Bellavance email to Wright, 09/08/2018		
WW.	Burgess Report, 11/28/2018		
XX.	Wright Letter to Corrow, 02/06/2019		
YY.	Jack Ryan Report. 06/19/2020		
ZZ.	Ryan Still Shot #1		
AAA.	Ryan Still Shot #2		
BBB.	Ryan Still Shot #3		
CCC.	Ryan Still Shot #4		
DDD.	Ryan Still Shot #5		
EEE.	Ryan Still Shot #6		
FFF.	Ryan Still Shot #7		
GGG.	Ryan Still Shot #8		
HHH.	Ryan Still Shot #9		
III.	Ryan Still Shot #10		
JJJ.	Ryan Still Shot #11		

Dated this 12<sup>th</sup> day of August, 2024, at Burlington, Vermont.

CITY OF BURLINGTON, POLICE CHIEF  
BRANDON DEL POZO, AND POLICE  
OFFICER JOSEPH CORROW

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